



GOVERNMENT OF PUERTO RICO
ENVIRONMENTAL QUALITY BOARD

July 17, 2018

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Acting Manager
Land Pollution Area

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Inspection Report

Curtis Instruments of PR, Inc.
Carolina, PR – PRR000025742

The above-mentioned company was visited on May 10, 2018. During the visit, a Small Quantity Generator Inspection was performed in order to determine their compliance with the Federal Resource Conservation and Recovery Act (RCRA) and State Regulation for the Control of Hazardous Solid Waste (RCHSW).

Attached please find the following documents with regard to this inspection:

- Inspection Report
- Notification to the company



INSPECTION REPORT

Curtis Instruments of PR, Inc. is located at 4 Ruedas St. Lot #6, Sabana Abajo Industrial Park, Carolina, Puerto Rico. Its postal address is PO Box 888, Carolina, PR 00986. The telephone number is (787) 757-9060.

On May 10, 2018, an inspection was performed to the company by Mrs. Ivette M. Rodríguez, in order to verify its compliance with local and federal hazardous waste regulations. The company is classified in RCRA Info Data Base as a Small Quantity Generator (SQG) of hazardous waste. During the inspection the following personnel were contacted: José Meléndez – EHS Facility Supervisor, Hector Ibarra – Maintenance Supervisor, José Hernandez – Manufacturing Engineering & Maintenance Manager, and Alberto Alvarado – Vice President and General Manager.

Curtis Instruments of PR Inc. is engaged in the manufacture of speed control boards of forklifts, golf cars, electric wheelchairs and instrumentation. The company began operations in 1986 and actually employs approximately 290 persons. The hazardous waste generated from this operation includes lead and alcohol contaminated wipes, lead contaminated disposable gloves, lead, manufacturing residues with lead and waste from cleaning procedures, among others. From the building maintenance used fluorescent lamps and batteries are generated.

The areas visited included the Hazardous Waste Containers Storage Area (HWCSA), Manufacturing Area and Warehouse.

During the visit, the following requirements were reviewed:

Rule 704 D (3) (a-b) of RCHSW/40 CFR 262.34 c (1-2): Satellite Accumulation

At the company he observed satellite accumulation areas (SAA's) are itemized as follows:

Area Description	Waste Description	Container Capacity
Manufacturing Area – SMT Line 3	Alcohol & Lead Contaminated Wipes	1 – 55 G
	Manufacturing Articles contaminated with Lead	1 – 5 G
	Alcohol & Lead Contaminated Wipes	1 – 55 G
Wave Solder Area – Sec. Prod.	Alcohol & Lead Contaminated Wipes	1 – 55 G
Product 1515 Area	Alcohol & Lead Contaminated Wipes	1 – 55 G
Room near Manufacturing Area	Aerosol Cans	1 – 55 G

At the time of the inspection the SAA's did not exceed the 55 gallons capacity, the containers looked in good conditions and were labeled indicating the contents.

Rule I-803 D (3-4) of RCHSW / 40 CFR 265.14 Subpart B: Security

The company has one (1) 180-day Hazardous Waste Containers Storage Area (HWCSA). Signs warning about the presence of hazardous waste in both English and Spanish languages were observed.

Rule I-803 F (4) of RCHSW / 40 CFR 265.15 (d): Records of inspection

The facility maintain records of the weekly inspections to the areas that are used to store hazardous waste.

Rule I-810 G of RCHSW/40 CFR 265.37 (a) (1): Evidence of the arrangements made with the local authorities

The company has developed an Emergency Response Plan that includes hazardous waste release control measures revised on April 23, 2018. The company has no evidence of submittal of this plan to government agencies. However, the company is part of the Local Committee for Environmental Emergency Response Planning of the Carolina District (LEPC). This group has regular meetings and the company showed evidence of the most recent meeting held on August 10, 2017.

Conclusion and Recommendations

As a result of the inspection performed to Curtis Instruments of PR, Inc. on May 10, 2018 and the information gathered, it was found that the company was in compliance with the minimum requirements set forth in the local and federal hazardous waste regulations (40 CFR 260-265).

A compliance letter will be sent to the company. Enclosed please find the letter to the company for your approval and signature.


Ivette M. Rodríguez
Compliance Officer

Rule I-810 of RCHSW / 40 CFR 265 Subpart C: Preparedness and Prevention

The HWCSA was provided with dike, alarm, communication to the area by means of 2-way radio and employees cellular phones, eyewash/shower station, portable fire extinguisher, spill control material and maintains sufficient aisle space to allow unobstructed movement of the personnel to inspect the containers.

704 D (d) (ii) (A-C) of RCHSW/40 CFR 262.34 (d) (5) (ii) (a-c): Preparedness and Prevention

The company has post at the HWCSA the name and number of the emergency coordinator, the Fire Department, Police Department and other state and local agencies involve in emergency management.

Rule I-812 (B) of RCHSW/40 CFR 265: Hazardous Waste Storage Facility Requirements

The containers located at the HWCSA were provided with roof and secondary containments to prevent spill releases to the environment.

Rule I-812 (C) of RCHSW/40 CFR 265 Subpart I: Use and Management of Containers

At the time of the inspection, it were observed six (6) hazardous waste containers stored in the HWCSA; all the containers were securely closed and labeled as hazardous waste.

Rule 704 D (1) (b) and (c) of RCHSW/40 CFR 262.34 (a) (2) & (3): Pre-Transport Requirements

The hazardous waste containers found at the HWCSA were labeled as hazardous waste and has the accumulation start date. They are itemized as follows:

Quantity	Waste	Acc. Date
1 – 55 G	Filters with traces of Lead	3/27/18
1 – 5 G	Coating Water	4/7/18
1 – 5 G	Coating Water	4/7/18
3 – 5 G	Pending Characterization	3/13/18

During the inspection, the following recordkeeping requirements were review:

Rule 502, 503 and 504 of RCHSW/40 CFR 262 Subpart D: Recordkeeping and Reporting

At the time of the inspection it was found that the company maintain records of the quantities and description of the hazardous waste once are generated, also has complete record of manifests copies (2015 – 2018). No incident reports or exception reports were required during the evaluated years.

Rule I-808 C of RCHSW/40 CFR 265.16: Personnel Training

The most recent training received by the company employees was the DOT Hazardous Material Transportation on November 14, 2016 and RCRA 40 CFR 262, 40 CFR 273 offered by The Allied Group.



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July 17, 2018

Mr. Alberto Alvarado

Vice President & General Manager
Curtis Instruments of PR Inc.
PO Box 888
Carolina, PR 00986

Dear Mr. Alvarado:

Inspection Report
Curtis Instruments of PR Inc.
Carolina, PR – PRR000025742

Reference is made to the inspection performed on May 10, 2018 to Curtis Instruments of PR Inc. by Mrs. Ivette M. Rodríguez, from the Land Pollution Area.

At the time of the inspection, the company was found in compliance with the Regulation for the Control of Hazardous Solid Waste (RCHSW) and 40 CFR 260 thru 265.

This compliance letter is related only and exclusively to the referenced inspection and does not preclude from further enforcement action.

We appreciate your cooperation.

Cordially,

Ricardo Palens Cruz, Esq.
Acting Manager
Land Pollution Area



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